

The School Counselor's Role in the 504 Process

A Position Paper of the Missouri School Counselor Association

Missouri School Counselor Association (MSCA) strongly supports the implementation of an effective 504 process that helps remove barriers to student learning and achievement. School counselors have a meaningful role in helping address student needs and are an integral member of a student's 504 team when that student falls under their caseload. School counselors may be the first line of contact from a parent to report a mental health or other disorder. School counselors may also be the initiator of an intervention for a struggling student. School counselors may be a part of staffings or evaluation team meetings and conferences when warranted and are regarded as knowledgeable, educated professionals able to share insight on particular students, as well as resources and interventions.

School counselors have a responsibility to develop and provide a comprehensive school counseling program for all students, including students with disabilities. The initiating, writing, and management of the 504 process falls under the non-guidance category of special programs and services according to the Missouri Comprehensive School Counseling Program. Furthermore, the American School Counselor Association (ASCA) states in their position statement on disabilities that the writing, coordinating and supervision related to a 504 are not appropriate duties of a professional school counselor. Placing the school counselor in the role of the 504 coordinator or case manager has a detrimental effect on the counselor's ability to provide a comprehensive school counseling program to all students.

The school counselor is an advocate for the student and may be an essential member of the 504 team. The strengths the school counselor brings as an effective communicator, collaborator, problem solver, interventionist, liaison, and mental health specialist creates a unique role for them on the 504 team. The conflict the 504 coordinator/case manager duties creates for school counselors include but is not limited to: lack of professional training in 504 and OCR (Office of Civil Rights) legalities and paperwork; dual relationship conflicts; extensive clerical time demand; counselors are mental health professionals as opposed to special education professionals; superior or administrative position with teachers; possibly a perceived adversarial role with parents instead of advocacy; and creates a barrier to availability to provide responsive services. When time is taken away from a school counselor's ability to provide direct student services and instead perform duties that place barriers on implementing the Missouri Comprehensive School Counseling Program, a counselor's ability to make a positive impact on student outcomes suffers.

MSCA strongly believes that school counselors should not be responsible for the development, implementation, and monitoring of any 504 plans. MSCA, in agreement with ASCA and the Missouri Comprehensive School Counseling Program, as designed by DESE, supports the position of excluding 504 case management responsibilities from the assigned duties of school counselors. The duties involved in the 504 process create significant barriers to implementation of a comprehensive school counseling

program school counselors are trained and devoted to provide, in order to address all student's social/emotional, career, and academic needs.

The School Counselor and Students with Disabilities (Adopted 1999; revised 2004, 2010, 2013) Retrieved from: http://www.schoolcounselor.org/asca/media/asca/PositionStatements/PS_Disabilities.pdf

(Gysbers, Stanley, Bunch, Magnuson, Starr) 2011. Missouri Comprehensive Guidance and Counseling: A Manual for Program Development, Implementation, Evaluation and Enhancement. Retrieved from: <https://dese.mo.gov/college-career-readiness/guidance-counseling>